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INFORMATION

~~FEB 1 1989~~

5HS-11

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stephen W. Holt
Project Coordinator
Environmental Control Dept.
NL Industries, Inc.
P.O. Box 1090
Hightstown, NJ 08520

Dear Mr. Holt:

The purpose of this letter is to inform NL Industries that final action with respect to the September 1988 Remedial Investigation (RI) Report for the NL Industries site in Granite City, Illinois is hereby taken by the U.S. EPA and Illinois EPA (the agencies). The September 1988 RI Report, with necessary changes as transmitted in U.S. EPA's January 10, 1989 letter to NL Industries, is hereby an integral and enforceable part of the RI/FS Administrative Order by Consent (RI/FS Order).

Additionally, the deadlines set forth in subparagraphs 14(b)(4), 14(b)(5), and 14(b)(7) of the RI/FS Order are hereby effective upon your receipt of this letter. As previously requested by NL Industries, Federal and State Applicable, Relevant, and Appropriate Requirements (ARARs) are provided in the attachment to this letter.

If you have any questions concerning this letter, please contact me at (312) 886-4742.

Sincerely yours,

Brad Bradley
U.S. EPA Project Coordinator

Attachment

cc: Ken Miller, IEPA
Nancy Mackiewicz, IAG

TJB 1/31/89

bcc: B. Kush, IL/IN #3
R. Grimes, 5CS-TUB-03
D. Dolan, 5HR-13

File;c-1Holt.D#6;myr;RERB;IL/INUnit#3;(Bradley)1/31/89

ARARs



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

Attachment 2

GENERAL RESPONSE ACTIONS

POTENTIAL ARAR'S

SLAG PILE CONTENTS (SPC)

1. NO ACTION	1,5,7,8,17,19
2. RCRA LANDFILL ON-SITE	1,5,7,8,16,17-19,22,23
3. RCRA LANDFILL OFF-SITE	1,5,7,8,17,18,20-23
4. SOLID WASTE LANDFILL ON-SITE	1,5,7,8,16,19,23
5. TREATMENT IN-SITU	1-7,8,17-19,22,23
6. TREATMENT ON-SITE	1-7,8-17,19,23
7. TREATMENT OFF-SITE	1-7,8-17,20,21,23
8. TEMPORARY STORAGE ON-SITE	1,5,7,8,17,19,23

OFF-SITE SOILS 7 SPC (OSS)

1. NO ACTION	1,5,7,8,17,19
2. RCRA LANDFILL ON-SITE	1,5,7,8,16,17-19,22,23
3. RCRA LANDFILL OFF-SITE	1,5,7,8,17,18,20-23
4. SOLID WASTE LANDFILL ON-SITE	1,5,7,8,16,19,23
5. TREATMENT IN-SITU	1-7,8,17-19,22,23
6. TREATMENT ON-SITE	1-7,8-17,19,23
7. TREATMENT OFF-SITE	1-7,8-17,20,21,23
8. TEMPORARY STORAGE	1,5,7,8,17,19,23

GROUNDWATER (GW)

1. NO ACTION	8
2. TREATMENT ON-SITE - EFFLUENT TO POTW	8,10,12-16,23
3. TREATMENT OFF-SITE AT POTW	8,10,12,13,15,21,23
4. TREATMENT OFF-SITE AT RCRA FACILITY	8,17,20,21,23
5. TREATMENT ON-SITE - EFFLUENT TO WATERS OF THE STATE	8,9,11,14,16,23

SURFACE WATER (SW)

1. DIVERSION/COLLECTION	8,12
2. TREATMENT ON-SITE - EFFLUENT TO POTW	8,10,12-16,23
3. TREATMENT OFF-SITE AT POTW	8,10,12,13,15,21,23
4. TREATMENT OFF-SITE AT RCRA FACILITY	8,17,20,21,23
5. TREATMENT ON-SITE - EFFLUENT TO WATERS OF THE STATE	8,9,11,14,16,23



Regulations

1. Pollution Control Board Rules and Regulations (PCBRR's); Title 35: Environmental Protection (EP); Subtitle B: Air Pollution (AP); Chapter 1: Pollution Control Board (PCB); 35 Ill. Adm. Code (IAC) Part 201: Permits and General Provisions; Subpart C: Prohibitions; Section 201.141: Prohibition of Air Pollution.
2. PCBRR's; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 201: Permits and General Provisions; Subpart D: Permit Applications and Review Process; Section 201.152: Construction Permit Application.
3. PCBRR's; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 201: Permits and General Provisions; Subpart D: Permit Applications and Review Process; Section 201.157: Operating Permit Application.
4. PCBRR's; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 203: Major Stationary Sources Construction and Modification.
5. PCBRR's; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 212: Visual and Particulate Matter Emissions; Subpart K: Fugitive Particulate Matter.
6. PCBRR's; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 212: Visual and Particulate Matter Emissions; Subpart L: Particulate Matter Emissions from Process Emission Sources; Section 212.321: New Process Sources.
7. PCBRR's; Title 35: EP; Subtitle B: AP; Chapter 1: PCB; 35 IAC Part 243: Air Quality Standards; Subpart B: Standards and Measurement Methods; Section 243.126: Lead.
8. PCBRR's; Title 35: EP; Subtitle C: Water Pollution (WP); Chapter 1: PCB; 35 IAC Part 302: Water Quality Standards; Subpart B: General Use Water Quality Standards and Subpart C: Public and Food Processing Water Supply Standards.
9. PCBRR's; Title 35: EP; Subtitle C: (WP); Chapter 1: PCB; 35 IAC Part 304: Effluent Standards; Subpart A: General Effluent Standards.
10. PCBRR's; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 307: Sewer Discharge Criteria; Subpart B: General and Specific Pretreatment Requirements and Subpart V: Nonferrous Metals Manufacturing.
11. PCBRR's; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 309: Permits; Subpart A: NPDES Permits.
12. PCBRR's; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 309: Permits; Subpart B: Other Permits.



Attachment continued

13. PCBRR's; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 310: Pretreatment Programs; Subpart B: Pretreatment Standards and Subpart D: Pretreatment Permits.
14. PCBRR's; Title 35: EP; Subtitle C: WP; Chapter 1: PCB; 35 IAC Part 312: Treatment Plant Operator Certification.
15. PCBRR's; Title 35: EP; Subtitle C: WP; Chapter 2: PCB; 35 IAC Part 370: Recommended Standards for Sewer Works.
16. Ill. Revised Statutes; Chapter 19; Paragraph 65(f): Floodplains Construction Permits.
17. PCBRR's; Title 35: EP; Subtitle G: Waste Disposal (WD); Chapter 1: PCB and Chapter II: Environmental Protection Agency (EPA); 35 IAC Part 700: Outline of WD Regulations; Part 702: RCRA and UIC Permits; Part 703: RCRA Permits; Part 705: Permit Issuance Procedures; Part 720: Haz. Waste Mgmt. System; Part 721: ID and Listing of Hazardous Waste; Part 722: Haz. Waste Generator Stds.; Subparts A-E; Part 723: Haz. Waste Transporter Stds.; Part 724: Stds. for Haz. Waste TSD Facility Owners and Operators, Subparts A-H, L and N; Part 725: Interim Status Standards for Haz. Waste TSD Facility Owners and Operators; Part 726: Standards.
18. PCBRR's; Title 35: EP; Subtitle G: WD; Chapter 1: PCB and Chapter II: EPA; 35 IAC Part 729: Landfills: Prohibited Haz. Wastes.
19. PCBRR's; Title 35: EP; Subtitle C: WD; Chapter 1: PCB and Chapter II: EPA; 35 IAC Part 807: Solid Waste, Subparts B, C, E and F.
20. PCBRR's; Title 35: EP; Subtitle C: WD; Chapter 1: PCB and Chapter II: EPA; 35 IAC Part 807: Solid Waste; Subpart B.
21. PCBRR's; Title 35: EP; Subtitle C: WD; Chapter 1: PCB and Chapter II: EPA; 35 IAC Part 809: Special Waste Hauling, Subparts B-G.
22. Ill. Revised Statutes, Chapter 111 1/2, Paragraph 1039(h):
23. PCBRR's; Title 35: EP; Subtitle H: Noise; Chapter 1: PCB; 35 IAC Part 901: Sound Emission Stds. and Limitations.

KM:jd/3216j/96

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE:

SUBJECT: NL Industries/Taracorp
Granite City, Illinois

FROM: Diane M. Spencer
RCRA Permitting Branch

THRU: Karl E. Bremer, Chief
RCRA Permitting Branch

TO: Brad Bradley, RPM
RERB, IL/IN Section, Unit 3

The Remedial Investigation and request for ARARS was reviewed. RCRA comments are included.

Taracorp notified and filed a Part A Permit Application with U.S. EPA for hazardous waste management activities in 1980. The facility, therefore, obtained RCRA interim status and RCRA regulations applicable to the facility.

The State of Illinois is authorized to operate their hazardous waste management program in lieu of the Federal program, with the exception of HSWA requirements. Therefore, Federal RCRA comments should serve as a supplement to the State ARARS.

Table 8 lists potential ARARS, including references to both Federal and State requirements. This table is very general, listing only major sections of RCRA. The table should be rewritten in the FS to address the proposed site remedies listed in Table 11 or the alternatives which are being seriously considered.

Hazardous waste piles are regulated under 40 CFR Parts 264 and 265, Subpart L. At closure, the waste, waste residues, contaminated containment systems, and contaminated subsoils and leachate must be removed (40 CFR Part 264.258) and managed as hazardous waste. Since this site has managed only characteristic hazardous waste, removal action should continue until the soils and groundwater no longer exhibit the characteristic(s).

If wastes or contaminants remain in place, the unit must close as a landfill (40 CFR Part 264.310). This includes the placement of a RCRA compliant cover system and post-closure care.

Characteristics hazardous waste will be subject to RCRA land disposal restrictions by May 8, 1990. If off-site disposal will be carried

through as a viable alternative, the treatment standard must be met prior to land disposal. Also, if on-site "placement" will occur, the land disposal restrictions will be applicable.

ARARs for proposed site remedies (action-specific ARARs) will be provided when the alternatives are formally proposed.

cc: George Hamper, IL Section Chief

P 951 069 870

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
PS Form 3800, June 1985 (Bradley Brad 315-11)

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↑(Extra charge)↑ ↑(Extra charge)↑

<p>3. Article Addressed to:</p> <p>Mr. Stephen W. Holt Project Coordinator Environmental Control Dept. NL Industries, Inc. P.O. Box 1090 Hightstown, NJ 08520</p>	<p>4. Article Number:</p> <p>P951-069-870</p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail</p> <p>Always obtain signature of addressee or agent and NOTE DELIVERED</p>
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U.S. Environmental Protection Agency

C/O Brad Bradley

230 S. Dearborn Street (5HS-11)

Chicago, Illinois 60604